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OFFICE OF THE  
CHIEF COUNSEL  
RULES DOCKET

I believe that SFAR 50-2 has already met the mandate of PL100-91, substantially restoring "natural quiet" to the region of the Grand Canyon, as evidenced by a reduction in complaints to a mere .0000085% of the over 5 million annual visitors. Prior to 1987, the entire Grand Canyon was a Free Flight Zone. The implementations of SFAR 50, 50-1, 50-2, have effectively made 87% of the Grand Canyon a "NO FLIGHT ZONE". Aviation safety has improved dramatically (there has not been a single aircraft accident in regulated airspace since the implementation of regulations on air tour corridors, altitude standards, and pilot training requirements).

On May 1, 1997 curfews were implemented. Rather than being able to fly from dawn until dusk, air tour operators are now limited to the hours of 8:00-6:00, May through September and 9:00-5:00 October through April. Each air tour operator has been allotted a finite number of aircraft that they may fly in the SFRA at any given time. Present regulations prohibit any new air tour operators from starting up a new business at the Grand Canyon. Many air tour operations have merged, and are using larger aircraft that can fly more people (but consequently have reduced the number of total flights-thereby limiting themselves to this number of total flights in the future, allowing no growth potential). Many have switched from tour routes to direct routes...Where does it end? How much is government going to be able to restrict private enterprise?

The "science" and methodologies employed by the National Park Service in their original report to Congress in 1994 were seriously flawed and have since been invalidated by statistical analyses conducted by the firm of J.R. Engineering. The J.R. Engineering report was reviewed by Dr. K.K. Ahuja of Georgia Tech who concurred in the statement that "the government studies were biased and misleading due to several invalid and unscientific assumptions that overstate the sound levels and sound detectability". Further, Dr. Ahuja agreed that the finding that "when these errors are corrected, the result is that over 95% of the Park will **meet** the Park Services own definition of 'natural quiet' in the busiest month of air tours (July)." In addition, customer surveys employed were determined to contain "serious flaws and biases in the study designs, sampling plans, sample implementations and data presentation" by the firm RMS Inc. This determination was supported in a review of the questionnaire by Dr David Gourley of Arizona State University and Mr. Michael Kamins of the University of Southern California.

I support the air tour operators' recommendation of the dog-leg modification of the dragon corridor flight route. This change in the flight pattern would have the effect of displacing any aircraft noise away from ground visitors. Further, I agree with all of the pilots who fly air tours at GCNP. Re-routing flights over the North Rim is unsafe.

Flying OVER the Grand Canyon is the most environmentally responsible way to experience it. Air Tours leave no trace .not even footprints. It is the choice for more than 800,000 people per year. Most people visit the Grand Canyon under time constraints, and/or are not physically capable of hiking or rafting the canyon. For the very young, the old, and the handicapped it's the only alternative.

Let's not limit the air tours for numbers sake. Independent Studies have concluded the goal of "Natural Quiet in 50% of GCNP, 75-100% of the day",

has been met or exceeded.

Substantial restoration of Natural Quiet has indeed occurred.

